

Exhibit 23



Sheppard, Mullin, Richter & Hampton LLP
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1422
213.620.1780 main
213.620.1398 fax
www.sheppardmullin.com

213.617.4206 direct
lcaseria@sheppardmullin.com

December 28, 2018

File Number: 48KZ-266044

VIA EMAIL

Michael N. Nemelka
Christine A. Bonomo
Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.
1615 M Street, N.W., Ste. 400
Washington, DC 20036-3215
mnemelka@kellogghansen.com
cbonomo@kellogghansen.com

Re: *Motor Vehicle Software Corp. v. CDK Global, LLC, et al.*, Case No. 1:18-cv-00865 (N.D. Ill.)

Dear Mike and Christine:

I write this letter on behalf of defendants to follow up on our telephonic meet and confer on December 20, 2018 regarding MVSC's interrogatory responses, document production and privilege log.

1. Interrogatories

Thank you for confirming that MVSC will provide defendants with amended interrogatory responses in the first half of January. We look forward to receiving amended responses to interrogatories 8, 14, 15, 18, 22, 26, 30, 31, and 36.

2. Documents

a. Custodians

We continue to disagree about whether MVSC should add Josh Logsdon and Jamison Kingfield as document custodians. Defendants maintain that both of these individuals should be added as full document custodians, for the reasons we discussed. However, in an effort to reach a compromise, defendants are willing to agree that MVSC only needs to add Jamison Kingfield as a full document custodian.¹ Let us know if we have an agreement.

¹ Defendants reserve the right to renew their request for Josh Logsdon as a document custodian in the event that plaintiffs seek additional document custodians from defendants.

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b. MVSC's Production Date Range

As we explained, MVSC's production of emails improperly stops in January 2017. We requested that MVSC supplement its document production to include materials through the end of 2017, based on agreed custodians and search terms. You asked whether defendants would agree that MVSC does not have to provide a supplemental privilege log for documents post-dating the MVSC complaint, and indicated that MVSC could make a supplemental production quickly, prior to the Napa Bulusu deposition scheduled for January 25, 2019.

Defendants are willing to agree that if MVSC promptly supplements its document production to include emails for the full year of 2017 (based on agreed custodians and search terms, including Jamison Kingfield), and does so by January 11, 2019, it does not need to provide a supplemental privilege log for MVSC documents post-dating the date of its complaint. Let us know if we have an agreement.

You also asked whether we would agree not to seek to re-open the deposition of Joseph Nemelka based on any supplemental productions from MVSC. Without knowing what MVSC's supplemental productions will contain, defendants cannot agree to this request.

c. Responsive Documents Located on Google Drive

You confirmed that MVSC treated its Google Drive folders like any other centralized, noncustodial source of documents and searched them as appropriate, consistent with the parties' agreements.

With respect to the specific missing Google Drive files identified in my December 17 letter (which are also pasted below), you stated that you would go back and specifically search MVSC's Google Drive for these files. Thank you.

- MVSC_MDL_0027649: Google Drive document with filename "ADP Journal Entry Instructions"
- MVSC_MDL_0027649: Google Drive document with filename "CDK 3PA"
- MVSC_MDL_0014265: Google Drive document with filename "Reynolds Contract Exp Dates"
- MVSC_MDL_0031893: Google Drive document with filename "Illinois IL EVR"
- MVSC_MDL_0044866: Google Drive folder with filename "Import Documents"
- MVSC_MDL_0055472: Google Drive document with filename "Lightspeed Import"

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- MVSC_MDL_0066369: Google Drive document with filename "AVRS/CVR Flip Data"

3. MVSC's Privilege Log

You stated that you would undertake a re-review of documents in MVSC's privilege log relating to Rob Cohen or Jonathan Morrison and let us know the results. Thank you.

You stated that you had completed your re-review of documents in MVSC's privilege log relating to Weideman Group and would let us know the results. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Leo Caseria". The signature is fluid and cursive, with the first name "Leo" and last name "Caseria" clearly distinguishable.

Leo D. Caseria
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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